

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

CORRIONNE LAWRENCE,)	CASE NO.: 1:19-cv-02411
Plaintiff,)	JUDGE: JAMES S. GWIN
vs.)	MAGISTRATE JUDGE DAVID A. RUIZ
CUYAHOGA COUNTY, OHIO, et al.)	
Defendants.)	
)	
)	

**DEFENDANTS CUYAHOGA COUNTY, CHRISTOPHER LITTLE, BRANDON
SMITH, BARRY HICKERSON, AND BEVERLY WITT'S PRELIMINARY
ESTIMATE OF FEES AND EXPENSES**

Pursuant to the Court's order, ECF # 7, Defendants submit the following preliminary litigation budget. Defendants' estimate is based upon work necessary and proportionate to litigate this matter, as opposed to work overlapping with other matters handled by Plaintiff's counsel concerning the Cuyahoga County Corrections Center. Defendants propose bifurcation pursuant to FRCP 26(f)(3)(B) of discovery and motion practice concerning Plaintiff's discrete constitutional claims from his *Monell* claims.

Defendants contend that such a bifurcation allows the Court to first consider the threshold question of whether Plaintiff's factual allegations may find evidentiary support before subjecting the parties and the Court to broader, policy-based, discovery that will likely prove unnecessary.

<u>ATTORNEY'S FEES</u>		<u>COSTS</u>	
Preliminary Investigation and Filing Complaint	<u>\$0</u>	Depositions	<u>\$10,000</u>
Procedural Motions Practice	<u>\$2,000</u>	Experts	<u>\$15,000</u>
Discovery	<u>\$15,000</u>	Witness Fees	<u>\$1000</u>
Dispositive Motions Practice	<u>\$5,000</u>	Other	<u>\$0</u>
Settlement Negotiations	<u>\$1,600</u>		
Trial	<u>\$50,000</u>		
TOTAL FEES	<u>\$73,600</u>	TOTAL COSTS	<u>\$26,000</u>

Respectfully submitted,

MICHAEL C. O'MALLEY, Prosecuting Attorney
of Cuyahoga County, Ohio

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